

### **REMARKS**

The specification is amended to correct typographical errors. Claims 1 and 11 are amended. No amendment made was related to the statutory requirements of patentability unless expressly stated herein. Further, no amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references. The amendments made herein now more positively express limitations which were previously inherent in such claim(s), and accordingly are not for the purpose of narrowing and do not effectively narrow the scope of any claim.

Claim 20 is canceled. Claims 1-19 are pending in the application.

Claim 2 is objected to for allegedly including confusing language. However, the Examiner has not pointed to the confusing language, and therefore, Applicant can not appropriately respond to this objection.

Claims 1-20 stand rejected under 35 U.S.C. §112, second paragraph, for lacking sufficient antecedent basis. Applicant has amended claims 1 and 11 to provide antecedent basis, and therefore, this rejection is rendered moot.

Claims 1-4 and 11-14 stand rejected under 35 U.S.C. §102(e) as being anticipated by Abdel-Mottaleb et al., 6,253,201. Claims 5-8 and 15-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Abdel-Mottaleb et al. and Lim, 6,181,821. Claims 9-10 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Abdel-Mottaleb et al. and Lim and further in view of Shaw, 6,151,598. Claim 20 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Abdel-Mottaleb et al.

Regarding the rejection of claim 1 based on Abdel-Mottaleb, claim 1 recites sequentially inputting, into a processor, subject movie images from movie image information comprising a number of successive images and deriving feature values of the movie images. Claim 1 further recites deriving a first feature value and deriving a second feature value and **matching** the first feature value **with** the second feature value in accordance with a predetermined determination formula. That is, each of the first and second feature value are both derived from the **same** movie image. In contrast, Abdel-Mottaleb teaches a user provides a graphic representation of a target image 101 to the image retrieval system to determine the images 111 of a reference database 110 that are similar in characteristics to the target image 101 (col. 2, Ins. 60-64) wherein the reference database 110 may be a conventional video tape (col. 3, Ins. 5-10). That is, Abdel-Mottaleb teaches one of the two feature values **is produced by a user and not from the conventional video tape** (reference database 110), **and therefore**, Abdel-Mottaleb teaches comparing a target image 101 produced by a user to a reference database 110 such as a video tape. Accordingly, it is inconceivable that Abdel-Mottaleb teaches **matching** the first feature value **with** the second feature value as positively recited by claim 1, wherein the first and second feature values of claim 1 are both derived from the **same** movie image. Since Abdel-Mottaleb fails to teach or suggest a positively recited limitation of claim 1, claim 1 is allowable.

Moreover, the art of record, singularly or in any combination, fails to teach or suggest **matching** the first feature value **with** the second feature value as positively recited by claim 1, wherein the first and second feature values of claim 1 are both derived from the

same movie image. Consequently, no obviousness rejection based on the art of record can be appropriately presented to reject claim 1. Claim 1 is allowable.

Claims 2-10 depend from independent claim 1, and therefore, are allowable for the reasons discussed above with respect to the independent claim, as well as for their own recited features which are not shown or taught by the art of record.

Regarding the rejection of claim 11 based on Abdel-Mottaleb, claim 11 recites sequentially inputting, into a processor, subject movie images from the movie image information comprising a number of successive images and deriving feature values of the movie images. Claim 11 further recites **matching between a feature value obtained in the feature value calculation means and a feature value derived at the comparative information selection means**. That is, each of the feature values are both derived from the same movie image. In contrast, Abdel-Mottaleb teaches a user provides a graphic representation of a target image 101 to the image retrieval system to determine the images 111 of a reference database 110 that are similar in characteristics to the target image 101 (col. 2, Ins. 60-64) wherein the reference database 110 may be a conventional video tape (col. 3, Ins. 5-10). That is, Abdel-Mottaleb teaches one of the two feature values is **produced by a user and not from the conventional video tape** (reference database 110), **and therefore**, Abdel-Mottaleb teaches comparing a target image 101 produced by a user to a reference database 110 such as a video tape. Accordingly, it is inconceivable that Abdel-Mottaleb teaches **matching between a feature value obtained in the feature value calculation means and a feature value derived at the comparative information selection means** as positively recited by claim 11, wherein the feature values of claim 11

are both derived from the **same** movie image. Since Abdel-Mottaleb fails to teach or suggest a positively recited limitation of claim 11, claim 11 is allowable.


Moreover, the art of record, singularly or in any combination, fails to teach or suggest **matching** between the feature value obtained in the feature value calculation means and the feature value derived at the comparative information selection means as positively recited by claim 11, wherein the feature values of claim 11 are both derived from the **same** movie image. Consequently, no obviousness rejection based on the art of record can be appropriately presented to reject claim 11. Claim 11 is allowable.

Claims 12-19 depend from independent claim 11, and therefore, are allowable for the reasons discussed above with respect to the independent claim, as well as for their own recited features which are not shown or taught by the art of record.

This application is now believed to be in immediate condition for allowance, and action to that end is respectfully requested. If the Examiner's next anticipated action is to be anything other than a Notice of Allowance, the undersigned respectfully requests a telephone interview prior to issuance of any such subsequent action.

Respectfully submitted,

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